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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

OMINA KHADIJAH RITSON,

Defendant.

CASE NO. 2:24-CR-00058-AC

STIPULATION AND ~~PROPOSED~~ ORDER TO  
CONTINUE HEARING FOR MOTIONS IN  
LIMINE, MOTION TO SEVER, AND JURY TRIAL

DATE: November 17, 2025

TIME: 9:00 a.m.

COURT: Hon. Allison Claire

**STIPULATION**

The United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, a hearing was set for Motions in Limine and Defendant's Motion to Sever on November 13, 2025.

2. By previous order, a jury trial was set for November 17, 2025.

3. The Court, on its own motion, vacated the hearing to hear motions and jury trial.

4. By this stipulation, the parties now move to continue the hearing on Motions in Limine and defendant's Motion to Sever until February 9, 2026.

5. By this stipulation, the parties also request to continue the jury trial until March 2, 2026, and to exclude time between November 17, 2025, and March 2, 2026, under Local Code T4.

6. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the discovery associated with this case  
2 includes investigative reports, related documentation, and substantial video surveillance footage.  
3 All of this discovery has been either produced directly to counsel and/or made available for  
4 inspection and copying.

5 b) Counsel for defendant desires additional time to consult with his client, conduct  
6 investigation and research related to the charges, review discovery, and otherwise prepare for  
7 trial.

8 c) Counsel for defendant believes that failure to grant the above-requested  
9 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
10 into account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the  
13 case as requested outweigh the interest of the public and the defendant in a trial within the  
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
16 et seq., within which trial must commence, the time period of November 17, 2025 to March 2,  
17 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
18 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
19 of the Court's finding that the ends of justice served by taking such action outweigh the best  
20 interest of the public and the defendant in a speedy trial.

21 7. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial

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1 must commence.

2 IT IS SO STIPULATED.

3  
4 Dated: November 14, 2025

ERIC GRANT  
United States Attorney

5  
6 /s/ Zachary Malinski  
ZACHARY MALINSKI  
J. DOUGLAS HARMAN  
Assistant United States Attorneys

7  
8  
9 Dated: November 14, 2025

10 /s/ Michael Heumann  
MICHAEL HEUMANN  
Counsel for Defendant  
OMINA KHADIJAH RITSON  
11  
12 (Approved via email 11/14)

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14  
15 **[PROPOSED] ORDER**

16 The Court, having received and considered the parties' stipulation, and good cause appearing  
17 therefrom, sets the hearing on Motions in Limine and defendant's Motion to Sever for February 9, 2026.  
18 The Court further orders that the jury trial is set for March 2, 2026 as requested.

19 DATED: November 17, 2025

20 Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE